

SHER TREMONTE LLP

October 29, 2015

**BY CM/ECF**

The Honorable James Orenstein  
United States Magistrate Judge  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11216

Re: *United States v. Hurant*, 15-mj-780

Dear Judge Orenstein:

I write on behalf of my client, Jeffrey Hurant, to respectfully request that his release travel restrictions be modified to allow him to travel to Boston, MA, from November 2 to November 4, 2015. The government consents to this application.

On or about August 25, 2015, Mr. Hurant was arrested in the Eastern District of New York in connection with this matter. On the same day he was arrested, Mr. Hurant was released on a \$350,000 bond, and his travel was restricted to New York City, Long Island, and New Jersey.

We respectfully request that Your Honor modify Mr. Hurant's travel restrictions to allow him to travel to Boston, MA, from November 2 to November 4, 2015, to attend a job interview and visit a friend.

I have discussed this matter with Assistant U.S. Attorney Tyler Smith and U.S. Pretrial Services Officer Ashley Calvi. AUSA Smith consents to the requested travel modification. Officer Calvi advises that Pretrial Services is neutral on the request and that Mr. Hurant is in full compliance with all conditions of release. If this request is approved, Mr. Hurant will provide Pretrial Services with his travel itinerary

Respectfully submitted,

Noam Biale (NB-8072)